

Attorneys Listed on Signature Page

E-FILED - 2/21/08

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

RAMBUS INC.,

Plaintiff,

V.

HYNIX SEMICONDUCTOR INC., HYNIX SEMICONDUCTOR AMERICA INC., HYNIX SEMICONDUCTOR MANUFACTURING AMERICA INC.,

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG SEMICONDUCTOR, INC.,
SAMSUNG AUSTIN SEMICONDUCTOR, L.P.,

NANYA TECHNOLOGY CORPORATION,
NANYA TECHNOLOGY CORPORATION
U.S.A.,

Defendants.

CASE NO. C 05-00334 RMW

**STIPULATION AND []
ORDER REGARDING USE OF
OKI CONFIDENTIAL
INFORMATION**

Trial Date: January 29, 2008
Judge: Hon. Ronald M. Whyte

1
2 RAMBUS INC.,

CASE NO. C 06-00244 RMW

3 Plaintiff,

4 vs.

5 MICRON TECHNOLOGY, INC., and MICRON
6 SEMICONDUCTOR PRODUCTS, INC.,

7 Defendants.

8 HYNIX SEMICONDUCTOR INC., HYNIX
9 SEMICONDUCTOR AMERICA INC., HYNIX
10 SEMICONDUCTOR MANUFACTURING
AMERICA INC.,

CASE NO. C 00-20905 RMW

11 Plaintiffs,

12 vs.

13 RAMBUS INC.,

14 Defendant.

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1 WHEREAS defendant Rambus Inc. ("Rambus") has entered into two licensing
2 agreements ("the Licenses") with Oki Electric Industry Co., Ltd. ("Oki"), regarding Oki's use of
3 certain Rambus SDR and DDR SRAM products, along with their associated memory modules
4 and controllers ("the Rambus products");

5 WHEREAS Oki has paid royalties to Rambus based on sales of Oki products
6 pursuant to the Licenses;

7 WHEREAS Oki represents that the actual amounts Oki has paid to Rambus
8 pursuant to the Licenses (but not the royalty rates) and the actual volume of Oki's sales relevant
9 to the Licenses represent confidential and proprietary business information ("the Oki Confidential
10 Information"); and

11 WHEREAS Oki represents that public disclosure of the Oki Confidential
12 Information in the present proceedings would lead to serious competitive harm to Oki;

13 THEREFORE, IT IS STIPULATED AND ORDERED THAT in the event that
14 any party (an "Introducing Party") seeks to introduce into the record at trial any exhibit, whether
15 substantive or demonstrative, containing any Oki Confidential Information, the Introducing Party
16 will request that the Court admit such exhibit into evidence under seal and take any other
17 measures necessary to preserve the confidentiality of the Oki Confidential Information. The
18 Introducing Party will request that such exhibit not become part of the public record. The
19 Introducing Party will also request that such exhibit shall not be displayed in such a manner that
20 its contents are visible from the public gallery in the Courtroom. All other parties agree to
21 support and to not oppose the Introducing Party's request.

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SO ORDERED.

DATED: 2/21/08

Dated: February 8, 2008

Ronald M. Whyte
H. D. 115 W.

Hon. Ronald M. Whyte

MUNGER, TOLLES & OLSON LLP

By: /s/ Keith R. D. Hamilton

Gregory P. Stone
Steven M. Perry
Peter A. Detre
Keith R. D. Hamilton
Counsel for Plaintiff RAMBUS INC.

Dated: February 8, 2008

QUINN EMANUEL URQUHART OLIVER & HEDGES

By: /s/ *Aaron Craig*

Harold A. Barza
William Price
Aaron Craig

Coordinating Counsel for the Manufacturers
Hynix Semiconductor, Inc., *et al.*

ACCEPTED AND AGREED TO:

BERGESON, LLP, counsel for Oki Electric
Industry Co., Ltd.

By: /s/ Melinda M. Morton

Melinda M. Morton

Filer's Attestation:

I, Keith R. D. Hamilton, am the ECF user whose identification and password are being used to file this **STIPULATION AND [PROPOSED] ORDER REGARDING USE OF OKI CONFIDENTIAL INFORMATION**. In compliance with General Order 45.X.B, I hereby attest that the other parties to the action concur in this filing.

By: /s/ Keith R. D. Hamilton

Keith R. D. Hamilton